

KRIEGER KIM & LEWIN LLP

500 Fifth Avenue
New York, NY 10110

Telephone: (212) 390-9550
www.KKLLP.com

December 6, 2021

By E-Mail

The Honorable James L. Cott
United States Magistrate Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Seth Andrew, 21 Mag. 4262*

Dear Judge Cott:

We represent Mr. Seth Andrew in the above-captioned case. As set forth below, we write to respectfully request that the Court grant permission for Mr. Andrew to travel outside of his district of residence from on or about December 20, 2021 to on or about January 4, 2022. The government and Pretrial Services do not oppose this request.

Under the terms of his release, Mr. Andrew must remain within the District of Rhode Island, where he currently resides, except for attorney visits and court appearances. He is also permitted to travel to Massachusetts, Connecticut, and New York for periodic day trips, and the District of Columbia and Massachusetts for periodic overnight trips, provided that in all instances he receives prior approval from his Pretrial Services Officer.

We respectfully request that Mr. Andrew be permitted to travel from on or about December 20 to on or about January 4 to Florida to visit close family members for the holidays, including his father, sister, and wife's parents. Mr. Andrew intends to take a flight from Newark, NJ to Fort Myers, FL and return through the same airports. He will keep his Pretrial Services Officer apprised of his specific itinerary.

We thank the Court for its consideration of this request.

Respectfully submitted,
KRIEGER KIM & LEWIN LLP

By:


Edward Y. Kim
Varun A. Gumaste

cc: AUSA Ryan B. Finkel
Pretrial Services Officer Dominique Jackson (SDNY)
Pretrial Services Officer Tim Donohue (DRI)

Without objection from the Government or Pretrial Services, the request is approved.
SO ORDERED.

12/6/2021


JAMES L. COTT
United States Magistrate Judge